



THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

JAMES E. JOHNSON
Corporation Counsel

JOSEPH ZANGRILLI
Senior Counsel
Phone: (212) 356-2657
Fax: (212) 356-3509
jzangril@law.nyc.gov

March 4, 2021

VIA ECF

Honorable Robert M. Levy
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11205

Re: Maliek Brown v. City of New York et al.
19-CV-1575 (NGG) (RML)

Your Honor:

I am a Senior Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, assigned to the defense of the above-referenced matter. I write, jointly with plaintiff's counsel, Robert Marinelli, Esq., to respectfully request a sixty day extension of the discovery schedule from March 15, 2021 to May 14, 2021. There have been three previous requests to extend the discovery deadline.

The parties continue to make progress in litigating this matter and have scheduled virtual depositions for a number of the represented defendants, beginning next week. However, the process continues to be delayed by staffing and health related issues, resulting from the ongoing COVID-19 pandemic and working from remote locations.

In addition, in an effort to conserve time and resources, the parties have agreed and stipulated that any defendants served with a request for waiver of service on January 3, 2021, will answer or otherwise respond to the Second Amended Complaint by March 22, 2021. This will allow for the filing of one answer on behalf of all named and served defendants. A proposed stipulation has been attached to memorialize this agreement.

Accordingly, the parties respectfully request the Court extend the discovery deadline from March 15, 2021 to May 14, 2021.

Thank you for your consideration herein.

Respectfully submitted on behalf of the
parties,

/s/

Joseph Zangrilli
Senior Counsel

CC: Robert Marinelli, Esq. (*Via ECF*)